

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

MAPLEBEAR, INC., D/B/A INSTACART

Plaintiff,

v.

FALL LINE PATENTS, LLC,

Defendant.

Civil Action No. 25-cv-00137-SEH-MTS

MOTION FOR ADMISSION PRO HAC VICE OF PAUL T. QAULEY

Plaintiff, Maplebear, Inc., d/b/a Instacart (“Instacart”), by and through its counsel of record, Robert P. Fitz-Patrick of Hall, Estill, Hardwick, Gable, Golden & Nelson, PC hereby requests admission *pro hac vice* of attorney Paul T. Qualey (“Qualey”) in the above-styled action. In support, Instacart and its counsel state as follows:

1. Qualey is in association with the undersigned local counsel of record, Robert P. Fitz-Patrick. Mr. Fitz-Patrick has entered his personal appearance in this matter, is admitted to and in good standing with the bar of the United States District Court for the Northern District of Oklahoma, is a resident of Oklahoma and maintains a law office therein.

2. The undersigned certifies that Qualey is admitted to practice in the following courts: State Bar of New York, State Bar of District of Columbia, Southern District of New York, Eastern District of New York, Eastern District of Michigan, Western District of Tennessee, and the United States Court of Appeals for the Federal Circuit. Further, Qualey is a member in good standing in those courts and is a member in good standing of the bar of the highest court of the state of the District of Columbia, where Qualey is licensed and practices.

3. As required by LGnR4-3, upon the admission of Qualey *pro hac vice*, Mr. Fitz-

Patrick will continue to participate and represent Fall Line in the above-referenced case.

4. In accordance with LGnR4-3, Qualey's Request for Admission *Pro Hac Vice* is attached hereto as Exhibit 1. Further, the appropriate filing fee is being submitted directly to the Court Clerk. The undersigned's Recommendation for Admission is attached as Exhibit 2.

5. Finally, consistent with LGnR4-4, if admitted to practice in this matter, Qualey will file an entry of appearance.

6. A proposed Order for Admission *Pro Hac Vice* is contemporaneously submitted.

Dated: May 20, 2025

Respectfully submitted,

**HALL, ESTILL, HARDWICK, GABLE,
GOLDEN & NELSON, P.C.**

/s/ Robert P. Fitz-Patrick

Robert P. Fitz-Patrick, OBA #14713
320 South Boston Avenue, Suite 200
Tulsa, OK 74103-3706
Telephone: (918) 594-0400
Facsimile: (918) 594-0505
Email: rfitzpatrick@hallestill.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2025, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

David Wayne Wulfers
Michael S. Linscott
Matthew James Antonelli
Zachariah Harrington
Larry Thomspen
Rehan Safiullah

/s/ Robert P. Fitz-Patrick